

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

GERMAN ENRIQUE SERRANO-REYES,

Defendant.

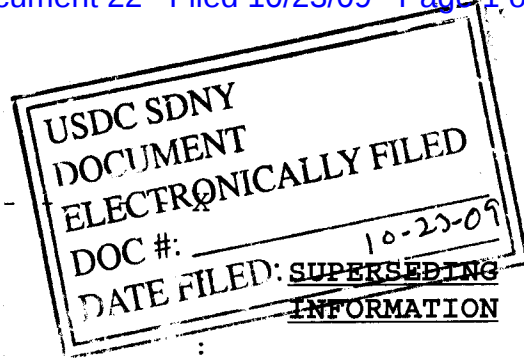
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COUNT ONE

The United States Attorney charges:

1. From in or about March 2007, up to and including in or about November 2008, in the Southern District of New York and elsewhere, GERMAN ENRIQUE SERRANO-REYES, the defendant, and others known and unknown, unlawfully, willfully and knowingly did combine, conspire, confederate and agree together and with each other to violate Title 18, United States Code, Section 1956(a)(1)(B).

2. It was a part and an object of the conspiracy that GERMAN ENRIQUE SERRANO-REYES, the defendant, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions, to wit, the transfers of millions of dollars by wire, represented the proceeds of some form of unlawful activity, unlawfully, willfully, and knowingly would and did conduct and attempt to conduct such financial transactions which in fact involved the proceeds of specified unlawful



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activity, to wit, illegal narcotics transactions, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership and the control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B).

OVERT ACT

3. In furtherance of said conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. In or about October 2008, a co-conspirator not named as a defendant herein registered, with the New York Department of State, a Domestic Limited Liability Company with Active Charter Number 3737173 in the name of "DMG Group LLC," located at 445 Park Avenue, 9th Floor, New York, New York, 10022.

(Title 18, United States Code, Section 1956(h).)

COUNT TWO

The United States Attorney further charges:

4. From in or about 1997, up to and including in or about 2007, in the Southern District of New York and elsewhere, GERMAN ENRIQUE SERRANO-REYES, the defendant, and others known and unknown, unlawfully, willfully and knowingly did combine, conspire, confederate and agree together and with each other to violate Title 18, United States Code, Section 1956(a)(1)(B).

5. It was a part and an object of the conspiracy that GERMAN ENRIQUE SERRANO-REYES, the defendant, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions, to wit, the transfers of millions of dollars by wire, represented the proceeds of some form of unlawful activity, unlawfully, willfully, and knowingly would and did conduct and attempt to conduct such financial transactions which in fact involved the proceeds of specified unlawful activity, to wit, illegal narcotics transactions, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership and the control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B).

OVERT ACT

6. In furtherance of said conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. In about 1998, a co-conspirator not named as a defendant spoke with GERMAN ENRIQUE SERRANO-REYES, the defendant, about undertaking a series of financial transactions to launder narcotics proceeds.

(Title 18, United States Code, Section 1956(h).)

FORFEITURE ALLEGATION

7. As the result of committing the money laundering offenses in violation of Title 18, United States Code, Section 1956, alleged in Counts One and Two of this Superseding Information, GERMAN ENRIQUE SERRANO-REYES, the defendant, shall forfeit to the United States pursuant to Title 18, United States Code, Section 982, all property, real and personal, involved in the money laundering offenses and all property traceable to such property, including but not limited to the following:

a. Millions of dollars in United States currency, in that such sum in aggregate is property which was involved in the money laundering offense or is traceable to such property;

b. The real property located at 175 SW 7th Street, #1810, Miami, Florida 33130;

c. The real property located at 175 SW 7th Street, #1811, Miami, Florida 33130;

d. The real property located at 175 SW 7th Street, #2008, Miami, Florida 33130;

e. The real property located at 455 5th Avenue, Half Moon Bay, California 94019;

f. The real property located at 90 Alton Road, #601, Miami, Florida 33139;

g. The real property located at 20201 E. Country Club Drive, #902, Aventura, Florida 33180;

h. The real property located at 951 Brickell Avenue, # 1906, Miami, Florida 33131;

i. The real property located at 951 Brickell Avenue, #2006, Miami, Florida 33131;

j. The real property located at 951 Brickell Avenue, #2304, Miami, Florida 33131; and

k. The real property located at 880 Biscayne Boulevard, Unit 2507, Miami, Florida 33132.

Substitute Asset Provision

8. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value;
or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 982 and 1956.)



PREET BHARARA
United States Attorney

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SUPERSEDING INFORMATION

(18 U.S.C. § 1956(h))

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PREET BHARARA
United States Attorney

* Filed Waiver of Indictment + Information.

10-23-09
DD

Def. pres. with attorney Mr. Del Valle + Mr. Perez.

AUSA Mr. Kasulis Court Reporter PaeS.

Interpreter (pres not pres. Deft. withdraws plea of not guilty & enters a plea of guilty to count(s) 1 + 2 .PSI Ordered. Sentence Not Set Set for 1/26/10

Bail cont Detained

Mag. Judge Peck recommends Judge Pauley
accept the guilty plea.

Peck.
U.S.M.J.